

**REMARKS**

Claims 1-18 are pending in this application. Independent claims 1 and 8 are herein amended. No new matter has been added by these amendments. Reconsideration of this application is respectfully requested in view the foregoing amendments and the following remarks.

Claim 1 has been amended to recite a lighting system “located behind a display unit.” Support for this amendment is found throughout the specification and figures, as filed, for example at page 6, lines 16-17. Claim 1 has also been amended to recite that light emitted by the light emitting element is outputted from the light outputting surface “toward the display unit.” Support for this amendment is found throughout the specification and figures, as filed, for example at page 6, lines 19-22.

Claims 1 and 8 have been amended to recite that the lighting system comprises a light emitting element that contains an electroluminescent material that “has a red light emitting layer, a blue light emitting layer, and a green light emitting layer.” Support for this amendment is found throughout the specification and figures, as filed, for example at page 12, lines 10-12. Claims 1 and 8 have been amended to recite that the entire light emitting element emits “white” light and that the lighting system further comprises a light outputting surface located on a passivation film, wherein “white” light emitted is by the light emitting element. Support for this amendment is found throughout the specification and figures, as filed, for example at page 7, line 31 to page 8, line 2.

**Claim Rejections – 35 U.S.C §102**

1. Claims 1-5, 7-8, 11-16, and 18 have been rejected under 35 U.S.C. 102(e) as being anticipated by Kim et al. U.S. Publication No. 2003/0067266 (“Kim”). Applicants respectfully traverse this rejection.

Claim 1 recites a structure of a lighting system “located behind a display unit” comprising, *inter alia*, a substrate and a light emitting element “located on the substrate.”

Kim, on the other hand, discloses in FIGS. 4 and 5, an organic electroluminescent device comprising, *inter alia*, an organic electroluminescent diode E, a Thin Film Transistor T, and a storage capacitor C<sub>ST</sub>. The structure of the organic electroluminescent diode E consists of a compensation layer 138, which is located on a top passivation layer 136, which is located on a second electrode 130, which is located on an organic electroluminescent layer 128, which is located on a first electrode 126, which is located on a third passivation layer 124, which is located on a second passivation layer 118, which is located on a first passivation layer 114, which is located on a passivation layer 104, which is located on a substrate 100.

The organic electroluminescent device disclosed by Kim is, in fact, a display unit. (See for example, Kim at ¶ 26). Thus, the organic electroluminescent device disclosed by Kim is not “located behind a display unit” as required by independent claim 1. Moreover, Kim fails to disclose a light outputting surface, wherein “white” light emitted by the light emitting element is outputted from the light outputting surface “toward the display unit” as required by claim 1. Similarly, Kim fails to disclose a display comprising “a back light unit” as required by claim 8.

Further, the structure of the organic electroluminescent device disclosed by Kim does not have a light emitting element “located on the substrate,” as required by independent claims 1 and 8. That is, there are four different passivation layers between the organic

electroluminescent diode E and the substrate 104. Kim also fails to disclose a light emitting element that contains an electroluminescent material “and has a red light emitting layer, a blue light emitting layer, and a green light emitting layer” and that the entire light emitting element emits “white” light as required by claims 1 and 8.

In summary, Kim fails to disclose each and every claim limitation of independent claims 1 and 8. Thus, the invention of Kim cannot be fairly said to anticipate the lighting system and display unit recited in claims 1 and 8, respectively. Claims 2-5, 7, 11-16, and 18, which ultimately depend from claim 1 or 8, are believed to define patentable subject matter for at least similar reasons. Withdrawal of the rejection applied to claims 1-5, 7-8, 11-16, and 18 under 35 U.S.C. 102(e) as being anticipated by Kim is respectfully requested.

### **Claim Rejections – 35 U.S.C § 103**

2. Claims 9 and 10 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Kim as applied to claim 8 above, further in view of Faris U.S. Patent No. 5,828,427 (“Faris”). Applicants respectfully traverse this rejection.

Claims 9 and 10 depend from independent claim 8, which is believed to define patentable subject matter based on the foregoing remarks. Withdrawal of the rejection applied to claims 9 and 10 under 35 U.S.C. 103(a) as being unpatentable over Kim in view of Faris is respectfully requested.

3. Claims 6 and 17 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Kim. Applicants respectfully traverse this rejection.

Claims 6 and 17 depend from independent claims 1 and 8, respectively, which are believed to define patentable subject matter based on the foregoing remarks. Withdrawal of the

rejection applied to claims 6 and 17 under 35 U.S.C. 103(a) as being unpatentable over Kim is respectfully requested.

**CONCLUSION**

Based on the foregoing amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

**AUTHORIZATION**

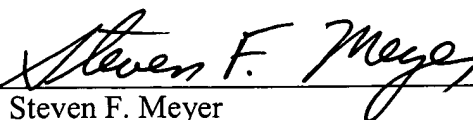
The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 13-4500, Order No. 5000-5095. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 13-4500, Order No. 5000-5112. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

Respectfully submitted,  
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